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**CITY OF SAN JOSE
DEVELOPMENT SERVICES**

June 27, 2007

Ms. Susan Walsh
City of San Jose
Department of Planning
200 East Santa Clara Street
San Jose, CA 95113

Subject: VTA's Comments to Draft Coyote Valley Environmental Impact Report

Dear Ms. Walsh:

Thank you for providing VTA the opportunity to comment on the Coyote Valley Specific Plan (CVSP) Draft Environmental Impact Report (DEIR). Overall, VTA is excited about the Coyote Valley Specific Plan, and the city's approach of comprehensively developing a community that uses the concepts, practices, actions identified in the Community Design and Transportation (CDT) manual of best practices. VTA is especially supportive of the overall vision to create an urban community that provides a range of mixed land uses and promotes all transportation modes including transit, walking, and biking.

Following is a list of comments on the proposed in the DEIR. Please note that many of the comments are consistent with comments VTA provided for the Coyote Valley Specific Plan.

General

- It appears that the project will affect roadway facilities outside the project area. Accordingly, VTA suggests using Congestion Management Program's (CMP) Deficiency Plan Guidelines to develop possible mitigating actions consistent with the Immediate Implementation and Deferred Implementation Action Lists.
- Page 147 states that City of San Jose could seek funding from regional sources to help finance major improvements to the transportation system, including upgrading and/or expanding the transit systems. To assist VTA in long range planning it is important to identify the type and amount of funding required from the regional sources and the improvements planned within the next 25 to 30 years.
- VTA would like the opportunity to review the proposed financial plan before it is approved. VTA hopes the financial plan will include a discussion about the funding sources for the construction, and ongoing operating and maintenance cost for traffic and transit improvements proposed in the DEIR. Please see the sections below for specific comments.
- VTA would like to be notified when the Gavilan Community College DEIR is released.

Mitigation Measures

Cumulative Transportation & Traffic Impacts

- Page XV – MM TRAN 17 - states transit improvements including: (i) enhancement of Caltrain service; (ii) LRT extension, and (iii) enhanced bus service could reduce traffic impacts to freeway segments. VTA currently does not have plans to increase LRT or bus services to Coyote Valley. However, future consideration of such improvements will be based on VTA's Board adopted Transit Sustainability Policy and Service Design Guidelines—which uses boardings per revenue hour thresholds to determine whether new service and service extension is preferable. Please indicate that any VTA service enhancements will require working with VTA staff to identify funding sources and project feasibility.
- Page 1 VIII improvement to Impact C-TRAN-4 states the CVSP will include a fixed guideway BRT system. VTA requests the DEIR specify that funding for this system will come entirely from the Coyote Valley financial district.

Transit

VTA Bus Transit Services to Coyote Valley

- Page 25 of the DEIR identifies plans to increase bus service to the valley and provide a bus shuttle service between Coyote Valley and the Santa Teresa LRT station. The DEIR should clearly state such improvements would require working with VTA staff to identify a project and funding requirements.
- Page 182 indicates that mitigation to the transit system is not required since the proposed project includes construction of the Caltrain station, implementation of shuttle service to the existing LRT station and an internal fixed guideway BRT system. However, as noted on page 163 of the DEIR, upon project build out, VTA's local and express bus services may carry up to an additional 500 to 600 riders during peak hours. VTA is pleased to see that Coyote Valley is building a community that encourages using VTA's transit system; however, in order to plan for future service expansion VTA would appreciate the estimated total projected increase in transit ridership.
- Figure 4.2-1, and Pages 121 and 162 state transit service in the vicinity of the proposed project site includes VTA bus route 68 and 501. VTA has converted bus route 501 to 182. Please update the DEIR to reflect this change.

Internal Fixed Guideway Transit

- VTA supports the idea of providing a development-funded internal in-valley transit circulator system within Coyote Valley. This system has the potential to significantly reduce the number of vehicular trips within the community and beyond.
- The term in-valley fixed guideway transit network and Bus Rapid Transit (BRT) seem to be used synonymously. The in-valley fixed guideway transit network does not meet the common definitions of BRT, or as specified in VTA's Board approved Transit Sustainability Policy and Service Design Guidelines, which, on a basic level, require both high-speed operations and exclusive ROW. Please clarify the differences between the two systems and/or use one word to describe the intention of the infrastructure being considered in Coyote Valley (e.g., either an in-valley transit system or BRT).
- Page 25 states there is a potential to convert the internal fixed guideway transit system to LRT in the future. If construction of LRT is being considered, VTA suggests following the design criteria identified in VTA's Board approved Transit Sustainability Policy and Service Design Guidelines, which offer guidance for BRT and LRT to operate at desirable speeds.

- When the CVSP team is ready to choose the technology for the internal fixed guideway transit system, VTA asks the team to consult with VTA staff to identify a technology and operating standards that are compatible with VTA's existing transit system. This will create a regional transit network that offers riders a convenient and seamless experience.

LRT

- The DEIR mentions VTA LRT may extend to Coyote Valley in the future, and could potentially circulate within the Coyote Valley community. VTA ask that any reference regarding the extension of LRT to the valley clearly state that future discussions with VTA staff and action by VTA Board of Directors is required before this extension can be considered.
- Project objective 5 states, "The specific plan should plan for the extension of light rail and heavy rail into central Coyote Valley and use these facilities to orient development." VTA requests the City of San Jose work with VTA staff to identify the preferred locations for potential future LRT stations.

Caltrain

- Pages 25 and 162 of the DEIR states the construction of the Caltrain station is one of the proposed transit improvements within Coyote Valley. The report needs to clearly state that VTA, as part of the JPB, has not secured funding for this station and any future plans to add a station may require the Coyote Valley financial district to construct, operate and maintain the proposed station.
- VTA does not have regional funds available for the proposed Coyote Valley Caltrain Station. Please include a base case scenario that examines traffic conditions without a Caltrain Station and/or provide a funding source to build the proposed Caltrain Station.
- Page 72 – Policy #27 notes, "The City of San Jose should work with VTA, Caltrain, and other appropriate transit agencies to develop a Park and Ride lot to support public transit in the study area." The DEIR should note that VTA has not planned to construct a Park and Ride lot within the study area. The Coyote Valley financial district may be responsible for providing partial or full funding to construct and maintain this proposed Park and Ride lot.
- Page 121 of the report states Caltrain currently operates 4 AM northbound and 4 PM southbound trips, whereas Caltrain only operates 3 northbound trips in the morning and 3 in the afternoon. Please revise the DEIR to reflect these operating characteristics.
- Page 162 - The DEIR states VTA has plans to fund contraflow commuter rail service to Coyote Valley. VTA assumes contraflow commuter rail service, as mentioned in the DEIR, refers to reverse commute service. Currently VTA does not have funds allocated for reverse commute service. Please indicate in the DEIR that reverse commute may be desirable but there are no plans presently to fund this service.

Traffic

Arterial

- VTA appreciates that the CVSP team has considered improvements that complete the street network including adding sidewalks and pedestrian crossings at major intersections. As part of this practice, VTA hopes the team will also consider including transit amenities such as adding bus stops and bus shelter improvements at appropriate locations along major arterials.
- Section 4.2 and Appendix C of the DEIR identifies impacts to freeway segments, with most impacted segments located on US 101 between Silver Creek Valley Road and I-280. The Valley Transportation Plan 2030 (VTP 2030) identifies specific improvements for a segment of US 101 between Story Road and Yerba Buena Road. Some of these improvements will be constructed using already secured State

funding. Other improvements such as reconstruction of the US 101/Capitol Expressway interchange and the US 101/Yerba Buena Road interchange do not have funding secured. VTA encourages the City of San Jose to require CVSP to make financial contribution toward the construction of improvements such as these.

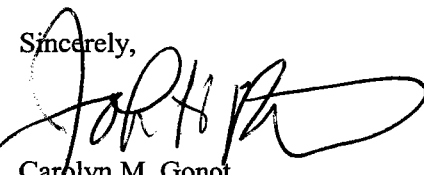
- The traffic mitigations for the Partial CVSP Conditions are the same as those for CVSP Build Out Conditions on Page 167 section 4.2.3. VTA recommends that the full list of mitigations identified for CVSP Build Out Conditions be implemented when the CVSP reaches Partial Build Out Conditions (20,000 jobs and 10,000 housing units which is consistent with the previously approved CVRP project). This Partial Build Out Conditions could be used as a trigger point for full mitigation as identified on Page 179 section 4.2.6.
- VTA recommends a reduced parking supply for CVSP compared the City of San Jose Parking Ordinance requirements. This will be consistent with the project objectives identified in the DEIR to create an urban, pedestrian and transit-oriented community with 40% identified as internal trips.

Bicycle and Pedestrian

- The Coyote Valley DEIR provides suggestions for improving pedestrian and bicycle circulation near railroad tracks, freeways and creeks. For additional suggestions on amenities to improve pedestrian and bicycle mobility, VTA suggests using VTA's Bicycle Plan for recommendations on incorporating pedestrian and bicycle accessible improvements.
- Roundabouts in general are an attractive way to accommodate vehicular flow with little motor vehicle and bicycle delay. However four-lane roads with roundabouts are not nearly as bicycle-friendly as two-lane roundabouts. Please make sure there are other convenient bicyclists and pedestrians options (e.g., undercrossings, etc.) that do not want to negotiate around these four lane roundabouts.

VTA encourages that the City of San Jose continues to offer VTA the opportunity to review future stages of the Coyote Valley planning process, including the financial district plan and proposed project phasing. If you have any questions regarding these comments feel free to contact Chris Augenstein, Transportation Planning Manager, at 408-321-7093, or Pamela Vasudeva, Transportation Planner III, at 408-321-5792.

Sincerely,


Carolyn M. Gonot
Chief Development Officer

CMG:PV:et